

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**TOMMY RAY MAYS II AND
QUINTON NELSON, SR., on behalf of
themselves and all others similarly
situated,**

Plaintiffs,

v.

**FRANK LaROSE, in his official capacity
as Ohio Secretary of State,**

Defendant.

Case No. 2:18-cv-1376

**JUDGE MICHAEL H. WATSON
Magistrate Judge Vascura**

CLASS ACTION

JOINT STIPULATION AND PROPOSED PROTECTIVE ORDER

Counsel for Plaintiffs and Defendant have conferred and agree to stipulate to the following protective order:

1. This Protective Order applies to the documents produced in response to subpoenas served by Plaintiffs on the following county boards of election and sheriff's offices on or about April 11, 2019: Butler, Cuyahoga, Franklin, Hamilton, Montgomery, and Summit.
2. Some of the documents requested in the subpoenas include personal information, including voter names, voter addresses, voter dates of birth, portions of voter social security numbers, Ohio drivers' license numbers, state identification numbers, and potentially other personal information. This information collectively shall be referred to herein as "Personal Identifiers."
3. Without permission of the Court, no document with Personal Identifiers shall be shared with any person or entity other than the parties to this litigation, their lawyers, paralegals, and support staff, and any witness, non-party expert witnesses or consultants engaged by

counsel of record to a party to assist such counsel in the prosecution or defense of this action, all of whom shall be bound by this Order.

4. The documents produced in response to the subpoenas can only be used for purposes of this litigation.
5. Within 60 days following conclusion of this litigation and all appeals, Plaintiffs shall destroy all documents containing Personal Identifiers.
6. Personal Identifiers shall not be quoted in any public filings. Instead, the Parties are to use separate anonymous identifiers such as “Person A” and to separately and confidentially disclose to the opposing party’s counsel the identity of Person A, so that the opposing party can effectively respond, as needed, to the allegation related to that individual.
7. To the extent it is necessary to attach a document with any Personal Identifiers to any pleading in this litigation, the party proposing to attach any such document shall move the Court for leave to file under seal or otherwise have all of the Personal Identifiers redacted.
8. It is the obligation of Plaintiffs’ counsel in this matter to provide a copy of this Order to the boards of election and sheriff’s offices (or their counsel) within one day of issuance of this Order. If any board of election or sheriff’s office has an objection to the Order, the board shall notify the Court of its objection within four days of the date of this Order.

Dated: May 7, 2019

SO ORDERED

Judge Michael H. Watson

Respectfully submitted,

/s/ Naila S. Awan

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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2019 the foregoing was filed electronically through the Court's Electronic Filing System. Parties will be served, and may obtain copies electronically, through the operation of the Electronic Filing System.

/s/ Naila S. Awan

Naila S. Awan (0088147)

Trial Attorney